

**UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

JOURNEY NEWELL, individually and on
behalf of a class of all persons and entities
similarly situated,

Plaintiff,

v.

LENDVIA LLC,

Defendant.

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CIVIL ACTIONNo. 25-cv-01018-GJP

Document Electronically Filed

**UNCONTESTED MOTION TO EXTEND THE TIME DEFENDANT
MAY ANSWER, MOVE OR OTHERWISE RESPOND TO THE COMPLAINT**

Defendant LendVia LLC (“Defendant”) hereby moves this Court pursuant to Fed. R. Civ. P. 6(b) and Local Rules 7.1. and 7.4, for the entry of an Order extending the time period within which Defendant may answer, move or otherwise respond to the Plaintiff’s Complaint by an additional thirty (30) days to April 23, 2025

1. The undersigned represents Defendant in this matter.
2. Andrew Roman Perrong, Esq. represents Plaintiff Journey Newell (“Plaintiff”) and the Proposed Class.
3. Defendant was served on or about March 3, 2025. *See* ECF # 4.
4. Presently, Defendant’s time to answer, move, or otherwise respond to the Complaint will expire on March 24, 2025. *See* Fed. R. Civ. P 4(d)(3).
5. The undersigned counsel was only recently retained and respectfully requests additional time to review the Complaint and prepare a defense.
6. No previous extension has been sought or obtained by Defendant.
7. Granting the foregoing Motion will not impact any currently set deadlines.

8. Defense counsel has spoken with Plaintiff's counsel, who consents to the relief requested in this Motion.

WHEREFORE, Defendant LendVia LLC respectfully requests that the Court grant its uncontested motion and enter an order in the form provided extending the time within which Defendant may answer, move or otherwise respond to the Complaint through April 23, 2025.

Dated: March 21, 2025

Respectfully submitted,

/s/Corey M. Scher

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*Attorneys for Defendant
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